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Attorneys for Texas Line 5, LLC

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE:

Ryan Nicholas Weiss,  
  
Debtor.

Case No. 21-31701-hdh11

Chapter 7

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Line 5, LLC d/b/a Texas Line 5, LLC,  
  
Movant,

v.

Ryan Nicholas Weiss,  
  
Debtor-Respondent.

**MOTION FOR EXAMINATION OF DEBTOR PURSUANT TO  
BANKRUPTCY RULE 2004**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Line 5 LLC, d/b/a Texas Line 5, LLC, a creditor in the above bankruptcy, complaining of Debtor, and files this its Motion for Examination of Debtor Pursuant to Bankruptcy Rule 2004, and in support thereof would show the Court as follows:

1. A voluntary Petition commencing the above Bankruptcy case under Chapter 11 of the Bankruptcy Code was filed on September 23, 2021 by Ryan Nicholas Weiss dba Flex Capital Investments, LLC, dba Castle Hills Financing, LLC, and dba Castle Hills Motors, LLC.

2. Line 5, LLC is the holder of an unsecured claim against Debtor in the amount of \$340,051.71 arising out of Judgment for unremitted warranty product cancellation refunds.

3. Default Judgment was signed in Case No 19-3784-442 styled *Texas Line 5, LLC vs. Castle Hills Motors LLC* on June 3, 2021. Thereafter, on July 12, 2021 Writs of Execution were requested for service upon Castle Hills Motors, LLC c/o Ryan Weiss, registered agent at 5557 Glenview Lane, The Colony, TX 75056; and Ryan Weiss at 5557 Glenview Lane, The Colony, TX 75056, with execution to be conducted by the Denton County Constable.

4. Line 5, LLC moves this Court for an order compelling Debtor to testify and/or provide information and/or documentation relating to the following topics:

- a. The operation and purported sale of his business, Castle Hills Motors.
- b. The Debtor's Schedules, including any PACER filings related to the Debtor's bankruptcy case.
- c. Any and all extended warranty or other products sold by Castle Hills Motors and financed by Movant, Line 5, LLC.
- d. Any documents requested and/or produced in response to paragraph 4 above.

6. Federal Rule of Bankruptcy Procedure 2004 provides that upon the motion of a party in interest, the Court may order an examination of any entity relating to, among other things, the property or liabilities of the Debtor and compel the production of documentary evidence which may affect the administration of the estate. Line 5, LLC further requests that Debtor be compelled

to produce documents relating to or referencing the Collateral, its condition or location, use of the Collateral, and insurance coverage of the Collateral.

6. Line 5, LLC requests that the Debtor be ordered to appear at 10 a.m. on January 5th, 2022, through video stream, without the necessity of a subpoena, for examination under oath by Line 5, LLC.

WHEREFORE, PREMISES CONSIDERED, Movant, Line 5, LLC prays that the Court grant the Motion and that Line 5, LLC have such other and further relief, in law and in equity, to which it may show itself to be justly entitled.

Respectfully submitted,

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By: /s/ Patrick M. Lynch  
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ATTORNEYS FOR MOVANT,  
LINE 5, LLC d/b/a TEXAS LINE 5, LLC

CERTIFICATE OF SERVICE

A true and correct copy of the Motion for Examination of Debtor pursuant to Bankruptcy Rule 2004 was served upon the parties listed below by electronic filing notification, on January 3, 2022.

U.S. Trustee  
1100 Commerce Street, Room 976  
Dallas, TX 75242

Areya Holder, Esq.  
Holder Law  
901 Main Street, Suite 5320  
Dallas, TX 75202

Scott M Seidel (SBRA V)  
Seidel Law Firm  
6505 West Park Blvd., Suite 306  
Plano, TX 75093

/s/ Patrick M. Lynch  
Patrick M. Lynch

CERTIFICATE OF CONFERENCE

I hereby certify that prior to filing the foregoing Motion:

XX Prior to filing this Motion for Relief, Movant believes that Movant and Debtors will reach an agreement concerning the Motion, or Debtors agreed to 2004 Exam of Debtor scheduled for January 5, 2022 at 10:00 a.m.

Therefore, this Motion is presented to the Court for determination.

/s/Patrick M. Lynch  
Patrick M. Lynch